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March 22, 2023

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**Via ECF**

Honorable Mary K. Vyskocil  
United States District Judge  
United State District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States of America v. Cesar Cruz  
Case No.: 21-CR-00504(MKV)

Your Honor:

This office represents Cesar Cruz, the Defendant in the above referenced matter which is currently on the Court's calendar for sentencing on April 6, 2023. **We write to request and adjournment of sentencing for 28 days – until May 2, 2023** – as we have only had an opportunity to review the PSR with the client within the last few days. In order to prepare a sentencing submission and review same with the client, and to gather letters of support from Mr. Cruz' family and friends, we require additional time.

I have previously advised AUSA Kaylan Lasky and AUSA Kedar Bhatia of this request and have not received a response as of yet. Therefore, we respectfully request that the Court adjourn this matter until May 2, 2023 or a date and time thereabouts convenient for the Court.

The Court's consideration of this request is respectfully appreciated. Thank you.

Yours truly,

*John Russo*

John L. Russo (JR6200)

Cc: AUSA Kaylan Lasky (Via E-mail)  
AUSA Kedar Bhatia (Via E-Mail)

**Granted. SO ORDERED.** The sentencing is ADJOURNED to May 2, 2023 at 11:00 a.m.

Date: March 23, 2023  
New York, New York

*Mary Kay Vyskocil*  
Mary Kay Vyskocil  
United States District Judge